REMARKS

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1, 4-7 and 10-15 are now present in the application. By this amendment claims 1 and 7 are amended. Claims 1 and 7 are independent.

Reconsideration of this application is respectfully requested.

Personal Interview

Applicants acknowledge with appreciation the courtesies extended by Examiner Matthew Ludwig to t he r representative. Mr. Robert J. Webster, Reg. No. 46,472, during the personal interview held on April 15, 2009. Applicants' representative presented arguments to the effect one of ordinary skill in the art would not be properly motivated to modify Micher in view of Onishi, as suggested in the outstanding Office Action, and indicated that the client would consider amending claims to change "sentence fragment- to read - - phrase - -. Examiner Ludwig indicated that he would consider Applicants' response, including the proposed amendments should they be presented in a response to the outstanding Office Action.

Applicants note that the Examiner's Interview Summary states that the interview was a telephonic interview, whereas it was a personal interview. Applicants request clarification of that fact in the next Office Action.

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Information Disclosure Statement

Applicants thank the Examiner for considering the Information Disclosure Statement

(IDS) filed on November 3, 2008, and for providing Applicants with an initialed copy of the

form PTO/SB/08 filed therewith.

Claim Rejections Under 35 U.S.C. § 103

Claims 1, 4-7 and 10-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable

over Micher, U.S. Patent No. 7,177,797, in view of Onishi, U.S. Patent No. 6,154,720. This

rejection is respectfully traversed.

Independent claim 1 recites "an input step for inputting at least a word as a keyword

through input means, an extracting step for extracting at least one sentence or phrase including

at least the keyword from a database through extracting means, and a text generation step for

generating an optimum sentence based on the extracted at least one sentence or phrase by text

generation means, wherein parser means morphologically analyzes and parses the extracted at

least one sentence or phrase to obtain a dependency structure of the at least one sentence or

phrase by determining the probability of dependency of the at least one sentence or phrase by

applying a statistical technique using a dependency model, thereby generating a sentence having

a maximum probability as the optimum sentence."

Independent claim 7 recites "input means for inputting at least one word as a keyword,

extracting means for extracting at least one sentence or phrase including at least the keyword

from a database, and text generation means for generating an optimum sentence by using the

extracted text, wherein parser means morphologically analyzes and parses the extracted at least

one sentence or phrase to obtain a dependency structure of the at least one sentence or phrase by determining the probability of dependency of the at least one sentence or phrase by applying a statistical technique using a dependency model, thereby generating a sentence having a maximum probability as the optimum sentence."

Applicants respectfully submit that the above combinations of steps and elements as set forth in independent claims 1 and 7 are not disclosed nor suggested by the reference relied on by the Examiner.

The Examiner has acknowledged that Micher fails to teach an extracting step for extracting at least one sentence or phrase including at least the keyword from a database through extracting means as recited in claim 1 and extracting means for extracting at least one sentence or phrase including at least the keyword from a database, as recited in claim 7.

In fact, Micher simply teaches a linguistic retrieval system to predict a *word*, not a sentence. Micher just teaches inputting (e.g., by a keyboard) letter(s) (not a word) and the letter(s) are fed into the word prediction software, then a designated number of selectable words and word chunks matching the letter(s) are displayed.

Micher contains no concept whatsoever of extracting at least one sentence or phrase including at least the keyword from a database, and therefore cannot generating an optimum sentence based on the non-extracted sentence or phrase.

In an attempt to remedy the shortcomings of Micher, the Office Action turns to Onishi and indicates that Onishi cures the deficiencies of Micher. Applicants respectfully disagree.

Onishi differs considerably from Micher. Onishi is directed to translating sentences from one language to another language, and begins by inputting a sentence. This differs from Micher,

which is directed to word prediction and inputs individual letters (characters) that make up a word, seeking to predict the word that is being entered one letter at a time.

Applicants respectfully submit that entering a complete sentence in Micher would be counterproductive because then Micher's system would have the words it wants without having to predict them from letters as they are inputted (e.g., by a keyboard). Applicants respectfully submit that one of ordinary skill in the art would not be motivated to modify Micher, as suggested, based on Onishi, because Onishi has no desire to predict a word from letters typed into a keyboard, but is, instead, directed to inputting complete sentences and translating the inputted complete sentences from one language to another, which not only has nothing to do with predicting words as individual characters of a word are entered via a keyboard, but is useless as an input to a word predictor.

The basis on which the Office Action concludes that it would be obvious to modify the word chunk methods of Micher (that enhance word prediction) to include the "known optimal sentence retrieval methods of Onishi," which "would have given the user a means of freely entering and retrieving word chunks, sentences and sentence fragments to improve a user's understanding of languages."

Applicants respectfully disagree with this conclusion for a number of reasons.

Firstly, Micher, the base reference, has no interest whatsoever improving a user's understanding of languages. Instead, Micher is only concerned with speeding up word prediction as a user types a letter on a keyboard. Micher is limited to a system in which letters are entered on a keyboard one at a time and Onishi has nothing whatsoever to do with speeding up word prediction as letters (characters) are entered in a keyboard.

Secondly, the only "known optimal sentence retrieval method" of Onishi that is discussed by the Office Action is "a means of entering a sentence which then automatically selects an optimal conversational sentence and displays the sentence." However, the Office Action never explains how Micher's will use Onishi's entered sentence or Onishi's displayed "optimal conversational sentence" to speed up word prediction, and it is not clear how this can even possibly be done.

Thirdly, the Office Action never discusses what is meant by Onishi's "optimal conversational sentence." Presumably it is a translated sentence, because Onishi enters a complete sentence ion a first language to start with and outputs a corresponding sentence in a second language. Again, the Office Action fails to explain how Micher's will use Onishi's translated sentence to speed up word prediction, and it is not clear how this can even possibly be done.

Moreover, Onishi selects a displayed sentence *simply based on the number of semantic features in the conversational sentence examples* (see col. 19, lines 25-28 and 46-49). This is not what is claimed. The claimed invention recites parser means that morphologically analyzes and parses an extracted sentence or phrase to obtain a dependency structure of the sentence or phrase by determining the probability of dependency of the sentence or phrase by applying a statistical technique using a dependency model, thereby generating a sentence having a maximum probability as the optimum sentence. Onishi contains no disclosure of this feature at all. Thus, even if one of ordinary skill in the art were properly motivated to modify Micher in view of Onishi (which would not be the case for reasons explained above) the so-modified version of Micher would still not disclose, suggest, or otherwise render obvious, the claimed invention.

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In addition, although Micher discloses morph function of the displayed word, this teaching simply relates to insertable morphing methodology for noun, adjectives or verbs (see Fig. 4D of Micher). Micher nowhere discloses that the morph function of the displayed *word* is applied to conversational *sentence* examples. Therefore, applying Onishi's teaching to Micher, the output sentence is still determined *only based on the number of semantic features in the conversational sentence examples,* not based on the morphological analysis and parsing of the conversational sentence examples. Accordingly, the combination of Micher and Onishi still fails to teach "parser means morphologically analyzes and parses the extracted at least one sentence or sentence fragment to obtain a dependency structure of the at least one sentence or sentence fragment by determining the probability of dependency of the at least one sentence or sentence fragment by applying a statistical technique using a dependency model, thereby generating a sentence having a maximum probability as the optimum sentence" as recited in claims 1 and 7.

Accordingly, neither of the references utilized by the Examiner individually or in combination teaches or suggests the limitations of independent claims 1 and 7 or their dependent claims. Therefore, Applicants respectfully submit that claims 1 and 7 and their dependent claims clearly define over the teachings of the references relied on by the Examiner.

Reconsideration and withdrawal of this rejection under 35 U.S.C. § 103 are respectfully requested.

CONCLUSION

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

PCL/RJW

In the event there are any matters remaining in this application, the Examiner is invited to

contact Robert J. Webster, Registration No. 46,472, at (703) 205-8000 in the Washington, D.C.

area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future

replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any

additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Dated: April 27, 2009   Respectfully submitted,

                                          By

                                          Paul C. Lewis
                                          Registration No.: 43,368
                                          BIRCH, STEWART, KOLASCH & BIRCH, LLP
                                          8110 Gatehouse Road
                                          Suite 100 East
                                          P.O. Box 747
                                          Falls Church, Virginia 22040-0747
                                          (703) 205-8000
                                          Attorney for Applicant